

SHER TREMONTE LLP

May 16, 2024

**VIA ECF AND EMAIL**

The Honorable LaShann DeArcy Hall  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re:** *United States v. Marcus Ricketts, et al.*,  
Case No. 22-CR-106 (LDH)

Dear Judge DeArcy Hall:

We represent Jonathan Goulbourne. We appreciate the government's clarification that our request that the Court order Mr. Goulbourne released from the SHU is not moot, ECF No. 347, and we accordingly renew it.

Respectfully submitted,

/s/ Noam Biale  
Noam Biale  
Martin Njoroge

*Attorneys for Jonathan Goulbourne*

cc: All counsel (via ECF)